REMARKS

This is intended as a full and complete response to the Final Office Action dated May 5, 2005, having a shortened statutory period for response set to expire on August 5, 2005. Please reconsider the claims pending in the application for reasons discussed below.

Claims 27-52 are pending in the application and remain pending following entry of this response.

Claim Rejections - 35 USC § 103

Claims 27-30, 32-42 and 44-52 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kingberg et al.* (*"Kingberg"*, US 5,734,887) in view of *Martin et al.* (*"Martin"*, US 6,553,368). Applicants respectfully traverse the rejection.

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. The present rejection fails to establish at least the first and third criteria.

Regarding the first criterion (i.e., motivation to combine the references), the Examiner merely concludes that "[o]ne of ordinary skill in the art would be motivated to make the aforementioned combination". Respectfully, this statement is merely an unsupported conclusion providing no specific reason why the Examiner believes a person skilled in the art would be motivated to combine the references. Accordingly, a *prima facie* case of obviousness has not been established. Because the rejection is believed to be defective, Applicants respectfully request that the rejection be withdrawn

Page 11

and the claims be allowed.

Regarding second criterion (i.e., the all limitations requirement) for a *prima facie* case of obviousness, the Applicants respectfully submit that the Examiner errs in suggesting that *Martin* teaches "an access method selected from at least two different access method types; wherein each of the different access methods types defines a different manner of exposing the physical data [corresponding to the logical field name of the respective logical field definition]". Examiner's Action dated May 5, 2005 (hereinafter "Action"), page 6, lines 4-6. *Martin* teaches access methods that describe "how to access what". Col. 5:3-4. Thus, the access method of *Martin* provides information on how to <u>access</u> data; *Martin*, however, does not teach access method types defining different manners of <u>exposing</u> data. Without limitation, various access methods configured for exposing data in different manners are described and claimed in the present application. For example, simple, filtered and composed access methods are defined and claimed. See, e.g., claims 28-30. Generally, these particular access methods define whether any manipulation of the data to be returned is done. *Martin* does not teach such access methods. Therefore, *Martin* does not teach an access method selected from at least two different access method types; wherein each of the different access methods types defines a different manner of exposing the physical data. Accordingly, the claims are believed to be allowable, and allowance of the same is respectfully requested

With regard to the Examiner's understanding of the access method taught by *Martin*, Applicants respectfully note that the Examiner confuses attributes of a request with the access method of *Martin*. For example, regarding claims 28 and 29, the Examiner refers to *Martin*, column 5, lines 38-46 as teaching a filtered access method defining a filter applied to physical data located at a location identified by a respective location attribute of a respective logical field definition, wherein the filter removes selected data from the physical data so that only a subset of the physical data is exposed by the respective logical field definition referencing the filtered access method. Action, page 7, lines 15-19. In fact, *Martin* teaches access methods that comprise "pointers to directory entries containing specific database access parameters." Col 5:4-

Page 12

7. The portion of *Martin* referred to by the Examiner (i.e., Col. 5: 38-46) relates to the operations that an LDAP message can specify, not to the disclosed access method of *Martin*. Therefore, the rejection is believed to be improper and Applicants respectfully request that the rejection be withdrawn and the claims be allowed.

Further, Applicants respectfully submit that the present rejection is defective for failing to allege that the access methods (of *Martin*) are referenced in a plurality of logical field definitions, as claimed. Rather, the rejection refers broadly to any general teaching of access methods. For example, the Examiner states that "*Kingberg* does not explicitly disclose a reference to an access method..." and then argues that "*Martin* discloses a reference to an access method...". Action, page 6, lines 1-4. The present claims do not generally claim access methods. Rather, the present claims recite access methods referenced in respective logical field definitions. As a result, whether the references, alone or in combination, teach access methods, generally, is insufficient for establishing a *prima facie* case of obviousness. Therefore, Applicants respectfully submit that the rejection is defective for failing to be drawn to the present claim language.
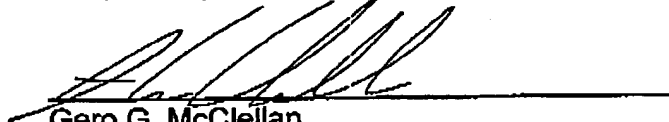
Claims 31 and 43 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kingberg*, further in view of *Martin* and further in view of *Krishnaprasad et al.* ("*Krishnaprasad*", US Application No. 20020078068). Applicants respectfully traverse the rejection.

Kingberg in view of *Martin* have been discussed above. Because the rejection based on the combination of *Kingberg* and *Martin* is believed to be defective for the reasons given, the combination of *Kingberg*, *Martin* and *Krishnaprasad* is also believed to be defective. Accordingly, Applicants respectfully request that the rejection be withdrawn and that the claims be allowed.

Page 13

RFOA 050505

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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RFOA 050505